

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Rayshell Fitzgerald)
Debtor(s))
Global Lending Services, LLC) CHAPTER 13
Movant)
v.) Case No.:23-10686 (AMC)
Rayshell Fitzgerald and)
Scott F. Waterman)
Trustee/Respondents)
)

**STIPULATION OF SETTLEMENT OF MOTION OF GLOBAL LENDING SERVICES,
LLC FOR RELIEF FROM THE AUTOMATIC STAY AND VACATING THE ORDER
FOR RELIEF**

This matter having been brought before the Court on a Motion for Relief From The Automatic Stay filed by Global Lending Services, LLC (“Global”), by and through its counsel, Keri P. Ebeck, Esquire and the Debtor not having opposed such motion through her counsel, Brad J. Sadek, Esquire and the parties having resolved said motion as hereinafter set forth and by the agreement of all counsel the parties hereby stipulate;

1. On or about February 29, 2023 the Debtor purchased a 2020 Mitsubishi Outlander Sport, VIN # JA4AP3AU5LU014469 pursuant to a Retail Installment Contract with Global, as the Lender.
2. On or about August 18, 2023 Global, filed a Motion for Relief from the Automatic Stay alleging the subject vehicle was behind on payments.
3. The Debtor was non-responsive to the Motion for Relief and to notices from her counsel and in the due course on or about September 14, 2023 the Honorable Court entered an Order Granting Relief from the Automatic Stay in favor of the Movant.
4. On or about September 26, 2023 the Debtor by and through her counsel filed a Motion for Reconsideration of the Order Granting Relief from the Automatic Stay in favor of Global.

5. At this time through October 2023, it is agreed that the Debtor is current on her vehicle payments and the Order Granting Relief from the Automatic Stay shall be Vacated.
6. All future payments must be received by the Movant by the 15th day of each month. Debtor will be in default under this Stipulation in the event that the Debtor fails to comply with future payments. If the Debtor Defaults under this Stipulation, Movant will send Debtor and Debtor's Counsel a Notice of Default. Debtor will have ten (10) days from the date of the Notice of Default to cure the default. If the default is not cured after ten days, a Certification of Default will be immediately filed with the Court by the Movant.

We hereby agree to the form and entry of this Order:

/x/ Brad Sadek
Brad J. Sadek, Esquire
Attorney for the Debtor

/x/ Keri Ebeck
Keri Ebeck
Attorney for Global Lending Services

/x/ Ann Swartz
Scott Waterman
Chapter 13 Trustee: _____

By The Court: _____